

MEMO ENDORSED

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November 4, 2020

**VIA ECF**

Hon. Kenneth M. Karas  
United States District Judge  
Southern District of New York  
United States Courthouse  
300 Quarropas Street, Chambers 533  
White Plains, New York 10601-4150

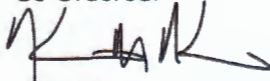
Re: *Marie Jean Charles, et al. v. Marquis Home Care, LLC*  
Civil Case No.: 20-cv-01715 (KMK)

Dear Judge Karas:

As counsel for the Defendant in the above-referenced matter, we write for all parties further to the parties' prior status updates and the Court's orders (Dkt. 29) to provide a status update and respectfully request a further modification of the briefing schedule in this matter. Plaintiffs recently made a new settlement proposal, which included for the first time additional claimants represented by counsel's office. Defendant is in the process of responding to that proposal, including investigation into these newly-asserted claims. The parties respectfully request a three-week extension of the deadlines to allow the parties to engage in meaningful further settlement negotiations. The revised proposed deadlines are: December 1, 2020 submission of Defendant's Rule 12 motion; opposition December 28, 2020; reply January 8, 2021. The parties thank the Court for its attention to this request and continued attention to this matter.

Granted.

So Ordered.

  
11/6/20

Respectfully submitted,

JACKSON LEWIS P.C.

*Noel P. Tripp*

Noel P. Tripp

NPT:dc  
Enclosure

cc: Counsel of Record (via ECF)  
4824-4319-9953, v. 2